## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WEIFANG TENGYI JEWELRY TRADING	) Case No. 18-cv-4651
CO., LTD.,	)
	) District Judge John F. Kness
Plaintiff,	)
	) Magistrate Judge Jeffrey Gilbert
V.	)
	)
THE PARTNERSHIPS AND	)
UNINCORPORATED ASSOCIATIONS	)
IDENTIFIED ON SCHEDULE "A"	)
	)
Defendants.	)

## NOTICE OF CORRECTED JOINT STATUS REPORT IN REASSIGNED CASE

To: See Attached Certificate of Service

Pursuant to this Court's Standing Order Regarding Reassigned Civil Cases [Doc. 350], on May 18, 2020, Plaintiff/Counter-Defendant Weifang Tengyi Jewelry Trading Co., Ltd. ("Plaintiff") filed a Joint Status Report In Reassigned Case [Doc. 354]. The Joint Status Report [Doc. 354] that Plaintiff filed was materially different from the draft joint status report that Defendants/Counter-Plaintiffs Intuii LLC and Jens Sorensen (collectively "Intuii") approved to be filed on its behalf. Without any notice to Intuii, Plaintiff added substantive portions that Intuii had never seen and rejected some changes that Intuii had made to the draft.

Specifically, Plaintiff inserted a lengthy section regarding its position on the Court's prior orders in Section V.A., without providing Intuii an opportunity to respond. Additionally, in Section II.A, Plaintiff deleted its own statement that "the above listed motions have not been mooted and require rulings" and, replaced that statement with a contention on Intuii's behalf (that Intuii had never seen) and its own argument regarding Intuii's pending motion for sanctions. The

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additional argument constitutes yet another attempt to submit further argument in response to

Intuii's pending sanctions motion (Plaintiff's request to file a sur-reply [Doc. 347] is still pending).

On May 27, 2020, after reviewing the electronically served Jointed Status Report and

recognizing the material changes in the document, Intuii notified Plaintiff that it objected to the

document that Plaintiff improperly filed as a joint document and requested that Plaintiff file a

corrected status report in accordance with the draft that was approved by both parties. Plaintiff

acknowledged Intuii's objection; but did not respond to Intuii's request that a corrected status

report be filed. On May 28, 2020, Intuii requested a clarification whether Plaintiff would file a

corrected status report, but Plaintiff has not responded. Therefore, in the interest of complying

with the Court's Standing Order by accurately providing Intuii's respective positions, attached

as Appendix 1 hereto, is a redline comparison between the document filed by Plaintiff without

Intuii's review or approval and the draft Joint Status Report In Reassigned Case that Intuii

approved for filing. The underlined text represents language added to the document by Plaintiff

and the cross-through text represents language deleted by Plaintiff. For convenience of the Court,

a clean version of the draft Joint Status Report that was approved by the parties is attached as

Appendix 2.

Respectfully submitted,

**INTUII LLC and JENS SORENSEN** 

Dated: June 12, 2020

By: /s/ Boris Zelkind

Attorney for Defendants

Boris Zelkind (admitted pro hac vice)

Meghan C. Killian (admitted pro hac vice)

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## **CERTIFICATE OF SERVICE**

The undersigned counsel for Defendants Intuii LLC and Jens Sorensen hereby certify that on <u>June 12, 2020</u>, a true and correct copy of **NOTICE OF CORRECTED JOINT STATUS REPORT** was filed electronically with the Clerk of Court through the Court's CM/ECF System, which will provide electronic notification of such filing to the following Counsel of Record:

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Attorneys for Plaintiff, Weifang Tengyi Jewelry Trading Co., Ltd.

Dated: June 12, 2020	By: /s/ Boris Zelkind
	Attorney for Defendants